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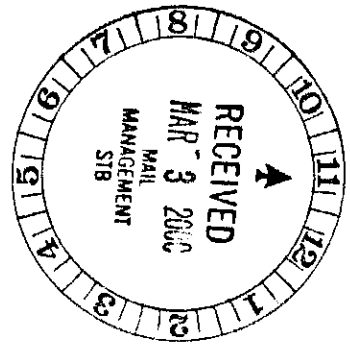
February 28, 2000

ENTERED
Office of the Secretary

Mr. Vernon A. Williams, Secretary
Surface Transportation Board
Office of the Secretary
Case Control Unit
Attn: STB Ex Parte No. 582
1925 K Street, N.W.
Washington, D.C. 20423-0001

MAR 03 2000

Part of
Public Record



Dear Sir:

Kemira Chemicals Canada Inc. is a manufacturer and distributor of hydrogen peroxide in North America. As such, Kemira is a user of rail service in the U.S. and Canada. The purpose of this letter is to comment on the issues to be discussed on March 8th, 2000 in Ex Parte 582.

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF combination is good for shippers, not on potential downstream effects. The CN-BNSF combination should be judged on its merits and if other carriers propose mergers, then these cases ought to be evaluated on their merits.

The timing of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service. Recent mergers have failed on service, not because of timing. Accordingly, the Surface Transportation Board should focus on ensuring that CN-BNSF combination, and any other future mergers, will deliver service.

The Surface Transportation Board has a comprehensive process to evaluate railroad transactions and protect the public interest. It should fairly evaluate the CN-BNSF combination according to that process.

Sincerely,
KEMIRA CHEMICALS CANADA INC.



Lucy Pouliot
Distribution & Logistics Manager

KEMIRA CHEMICALS CANADA INC.

Maitland Site
P. O. Box 615,
Maitland, ON K0E 1P0

1380 County Rd #2,
Maitland, ON K0E 1P0

Telephone (613) 348-7711

Facsimile (613) 348-7700